

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: May 21, 2004

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA 215) **Project #: V-O-04/11**

TO: Ed Tompkins – TFO/LMT  
Natural resource specialist

**Proposed Action:** Vegetation Management along the St. Helens-Allston 115 kV Transmission Line Corridor from 1/1 to Allston Substation. The project will include portions of the following adjacent transmission lines: Trojan-Allston No. 2 - 230 kV; St. Johns-St Helens 115 kV; Allston-Driscoll 230 kV and Keeler-Allston No. 1- 500 kV. Easement widths vary from 100 to 150 feet along the corridor.

**Location:** The project is located in Columbia County, OR in BPA's Olympia Region.

**Proposed by:** Bonneville Power Administration (BPA).

**Description of the Proposal:** BPA proposes to remove unwanted vegetation along the right-of-way, along access roads and around tower structures along the subject transmission line corridor that may impede the operation and maintenance of the identified transmission lines. BPA plans to conduct vegetation control with the goal of removing tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation.

Specifically, this vegetation management project will involve the following actions:

- Clearing (mowing, cutting, and spraying) vegetation at 16 tower sites.
- Selective cutting (cutting, lopping and scattering) of vegetation at 208 acres of ROW.
- Clearing (mowing, cutting, and spraying) approximately 5 acres of access roads in or adjacent to ROW.
- Side trim 8 trees, cut and chip or cut, lop and scatter 9 additional trees.
- Treating (spraying) approximately 18 acres of noxious weeds (scotch broom and blackberries) along the ROW.
- Applying low volumes of foliar herbicide 6–12 months after initial application to control resprouting plants and noxious weeds, and possible application three to four years after initial application to maintain accessibility to access roads and tower sites.

Debris will be disposed of using onsite chip, lop and scatter, or mulching techniques. All onsite debris will be scattered along the ROW. Removal of vegetation on slopes steeper than 20% and spanned canyons will be restricted to tall-growing species that pose a hazard to the transmission

line. Identified danger trees will be felled away from the ROW and left intact (whole). Trees that visually screen roads from the transmission line will be left where appropriate.

On initial entry, herbicide will be selectively applied using spot/stump treatment of resprouting species and low-volume foliar treatments along access roads, around tower structures, and at noxious weed locations. Garlon 3A herbicide (active ingredient: Triclopyr as triethylamine salt (TEA)) will be used in buffer zones established adjacent to riparian areas along the corridor and Garlon 4 (active ingredient: Triclopyr as butoxyethyl ester (BEE)) will be used in all other areas for this project. Backpacks will be used with a 25% Garlon 3A or 4 / 75% crop oil mix. Localized low-volume foliar treatments will use a 3% Garlon 3A or 4 mix in 97% water.

**Analysis:** A Vegetation Management Checklist was completed for this project in accordance with the requirements identified in the Bonneville Power Administration's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285).

The subject corridor traverses private lands consisting of residential, rural residential, and private timber lands.

Section 3 of the checklist identifies the natural resources present in the area of the proposed work. The following summarizes natural resources occurring in the project area along with applicable mitigation measures.

**Water Resources:** Waterbodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in section 3.1 of the Vegetation Management Checklist. Trees in riparian zones will be selectively cut to include only those that will grow into the minimum approach distances of the conductor at maximum sag. Shrubs will not be cut that are less than 10 feet high where ground to conductor clearance allows. No ground disturbing vegetation management methods will be implemented thus eliminating the risk for soil erosion and sedimentation near the streams. Adjacent to water resources only spot (cut-stump) and localized chemical treatments using practically non-toxic triclopyr (TEA) will be used.

No drinking water, irrigation wells, or water supplies were identified along the rights of way for this project.

**Threatened and Endangered Species:** Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species. A species list was obtained from the United States Fish and Wildlife Service (USFWS) on February 26, 2004 as potentially occurring in the project area. In addition a review of species under the jurisdiction of NOAA Fisheries was conducted. A determination of No Effect was made for all ESA listed species and designated critical habitat for the project.

**Essential Fish Habitat:** A review of NOAA database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources will be followed for EFH. A determination was made that this project will not adversely affect essential fish habitat.

**Cultural Resources:** No cultural resources are known for the project area. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the BPA Environmental Specialist, and the BPA archeologist will be contacted.

**Re-Vegetation:** Native grasses are present on the entire right-of-way and are expected to seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads.

**Monitoring:** The entire project will be inspected during the work period. Additionally, monitoring for the follow-up herbicide treatment will be in the mid to late summer.

**Findings:** This Supplement Analysis finds that (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/s/ James R. Meyer for  
 Elaine S. Stratton  
 Environmental Protection Specialist

CONCUR: /s/ Thomas C. McKinney  
 Thomas C. McKinney  
 NEPA Compliance Officer

DATE: 5/25/2004

Attachment:  
 St Helens-Allston 04 Vegetation Management Checklist

cc:  
 L. Croff – KEC-4  
 T. McKinney – KEC-4  
 J. Meyer – KEP-4  
 J. Sharpe – KEPR-4  
 E. Stratton – KEP-PSB-2  
 P. Key – LC-7  
 J. Hillyard Creecy – T-DITT2  
 K. Rodd – TF/DOB-1  
 A Campbell – TFO/Olympia  
 D. Krauss – TFO/Olympia  
 D. Swanson – TFOP/LMT  
 Environmental File – KEC-4  
 Official File – KEP-4 (EQ-14)